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ATTORNEYS FOR HALL CA-NV, LLC

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

In Re:

NEW CAL NEVA LODGE, LLC,  
A Nevada Limited-Liability Company;

Debtor

HALL CA-NV, LLC, a Texas Limited-  
Liability Company,

Appellant,

vs.

LAWRENCE INVESTMENT, LLC;  
OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS,

Appellees.

**Case No: 3:17-cv-00636-RCJ**

**US Bankruptcy Court, District of  
Nevada Case No: BK-16-51282-gwz  
Appeal Ref. No.: 17-49**

**DECLARATION OF FRANK J.  
WRIGHT IN SUPPORT OF HALL  
CA-NV, LLC'S CERTIFICATE OF  
COMPLIANCE WITH  
SUPERSEDEAS BOND ORDER**

1           STATE OF TEXAS           §  
2                                       §  
3           COUNTY OF DALLAS   §

4           BEFORE ME, the undersigned authority, on this day personally appeared Frank J.  
5 Wright, who under oath, deposed and said:

6           1.       “My name is Frank J. Wright. I am the attorney for Hall CA-NV, LLC (“**Hall**”).

7           2.       I have personal knowledge of the facts set forth in this Declaration.

8           3.       On October 25, 2017 the Court granted the motion of Hall to stay the *Order*  
9 *Confirming First Amended Plan of Liquidation for New Cal-Neva Lodge, LLC Jointly Proposed by Lawrence*  
10 *Investments, LLC and the Official Committee of Unsecured Creditors Dated August 16, 2017*  
11 *(“**Confirmation Order**”)* and *Order Conditionally Granting Motion to Approve Non-Material Plan*  
12 *Modification Hall (“**Plan Modification Order**”)* pending appeal. The Court conditioned the  
13 continuance of the stay upon Hall complying with the terms of a supersedeas bond as required by  
14 the Court on the record.  
15

16           4.       The Court ordered the preparation of an expedited transcript of the hearing on  
17 October 25, 2017. The transcript is not yet available and I have been advised it will not be  
18 available until next week.  
19

20           5.       It is my understanding that Hall was required to agree to the terms of the bond by  
21 October 27.

22           6.       Hall has circulated a proposed form of Supersedeas Bond Order to counsel that  
23 appeared at the hearing and endeavored to address their comments. The form of that order is  
24 attached to the Certificate filed by Hall.  
25

26           7.       Hall has inquired as to the current amount due to Capital One Bank and the  
27 monthly payments but has been advised that since the loan was in the process of foreclosure  
28 those amounts cannot be provided by phone but only in writing. Hall has not yet received the

1 final amounts but has used the last known amounts as approximate amounts in the form of the  
2 order.

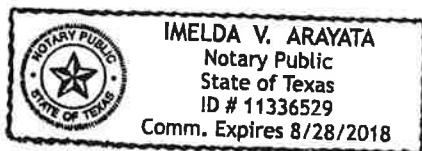
3 8. Hall is fully prepared to comply with the terms of the bond required by the Court  
4 upon entry of the Supersedeas Bond Order.

5 **FURTHER, AFFIANT SAYETH NOT.**

6  
7   
Frank J. Wright

8  
9 **SWORN TO AND SUBSCRIBED BEFORE ME** by Frank J. Wright on this 27th  
10 day of October 2017, to certify which witness my hand and seal of office.

11   
12 NOTARY PUBLIC in and for the State of TEXAS



**CERTIFICATE OF SERVICE**

I the undersigned, hereby certify that on the 27<sup>th</sup> day of October, 2017, the foregoing document was served on all parties consenting to electronic service in this case *via* the Court's CM/ECF system of the District Court.

/s/ Frank J. Wright

Frank J. Wright

The foregoing document has been delivered by other means to:

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